

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

-----X
JGIAP RH 160 LLC,

Plaintiff,

Case No.: 1:21-cv-2489 (DG) (JRC)

NOTICE OF MOTION

**CRI HOLDING CORP., TOURAJ NAGHIEH,
MORALI AND ASSOCIATES, ANTHONY MORALI,
JOSEPH MORALI, MANDA INTERNATIONAL
CORPORATION, STRIKEFORCE MECHANICAL
CORPORATION, AND ANGELO CORRAO,**

Defendants.

-----X

PLEASE TAKE NOTICE, that upon the accompanying Affirmation of Michael J. Mauro, Esq. and the Memorandum of Law submitted herewith, Defendants, Manda International Corporation, Strikeforce Mechanical Corporation, and Angelo Corrao, will move this Court before the Hon. Diane Gujarati, U.S.D.J., at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, for an Order directing Plaintiff and its counsel Armstrong Teasdale, LLP and Ryan M. Wilson, Esq. to pay monetary sanctions and attorneys' fees pursuant to (i) Rules 11(b)(1), (2) & (3), 11(c); (ii) 28 U.S.C. § 1927; and (iii) and the Court's inherent power, and for such other remedies as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that – pursuant to the Local Civil Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York – opposition papers must be served within fourteen (14) days of service of the moving papers, and reply papers must be served within seven (7) days of service of the opposition papers.

Dated: Lake Success, New York
June 30, 2022

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

By: _____/s/_____

Michael J. Mauro, Esq.

Emanuel Kataev, Esq.

Kyle F. Monaghan, Esq.

3000 Marcus Avenue, Suite 3W8

Lake Success, NY 11042-1073

(516) 328-8899 (office)

(516) 328-0082 (facsimile)

michael@mllaborlaw.com

emanuel@mllaborlaw.com

kyle@mllaborlaw.com

Attorneys for Defendants

Manda International Corporation

Strikeforce Mechanical Corporation

and Angelo Corrao